

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

BRENDA S. CAMPBELL,

Defendant.

NO. CR21-003 RSM

**INFORMATION (Felony)**

The United States Attorney charges that:

**COUNT 1**  
**(Wire Fraud)**

**A. The Scheme and Artifice to Defraud**

1. Beginning no later than December 2013, and continuing until November 2019, in Kent, within the Western District of Washington, and elsewhere, BRENDA S. CAMPBELL devised and executed a scheme and artifice to defraud Company-1; and to obtain moneys, funds, credits, assets, and other property under the custody and control of Company-1, by means of materially false and fraudulent pretenses, representations, and promises.

2. At all times relevant to this Information, Company-1 was a family-owned company in the business of buying, selling, and consigning consumer goods. Company-1

1 was founded in Washington State in 1986 and had multiple locations throughout the  
2 State. Company-1's headquarters were in Kent, Washington.

3 3. At all times relevant to this Information, BRENDA S. CAMPBELL was  
4 employed at Company-1. CAMPBELL started working at Company-1 in 2010 and she  
5 was promoted to Chief Financial Officer ("CFO") in 2014. As CFO, CAMPBELL had  
6 discretion over how to pay Company-1 expenses and how to record Company-1  
7 accounting and journal entries. CAMPBELL received Company-1 bank statements.

8 4. The essence of the scheme to defraud was for BRENDA S. CAMPBELL to  
9 use her authority as CFO to use Company-1 credit cards to make unauthorized and  
10 personal purchases, to cause money from Company-1 bank accounts to be fraudulently  
11 used to pay for these personal purchases, and to conceal the scheme by creating false  
12 accounting entries in the books and records of Company-1.

13 **B. Manner and Means of the Scheme and Artifice to Defraud**

14 5. BRENDA S. CAMPBELL was the CFO at Company-1 and had the  
15 authority to make payments from company accounts, and also had the responsibility of  
16 making accounting entries for expenses. However, CAMPBELL abused her authority to  
17 steal money under the control of Company-1 and use that money for her own benefit.

18 6. In connection with her employment at Company-1, BRENDA S.  
19 CAMPBELL was authorized to carry a company credit card from Bank of America  
20 ("BOA Company Card"). However, CAMPBELL abused her authority and opened an  
21 unauthorized American Express company credit card ("AMEX Company Card").

22 7. BRENDA S. CAMPBELL was authorized to use the BOA Company Card  
23 for appropriate Company-1 expenses. She was not authorized to use the BOA Company  
24 Card, or any Company-1 funds, for her own personal expenses. During the scheme to  
25 defraud, CAMPBELL fraudulently used both the BOA Company Card and the AMEX  
26 Company Card for personal expenses. CAMPBELL then caused Company-1 to pay the  
27 credit card bills for those personal expenses.  
28

8. BRENDA S. CAMPBELL covered up her fraudulent use of credit cards paid for by Company-1 by making false entries in Company-1's accounting records. CAMPBELL covered up her personal transactions by making false journal entries to make it appear that various unrelated segments of Company-1 paid for legitimate business expenses that were in fact CAMPBELL's illegitimate personal expenses.

9. BRENDA S. CAMPBELL's unauthorized transactions involved a variety of personal purchases, including personal clothing, home appliances, and professional sports tickets.

10. In total, during the scheme to defraud, BRENDA S. CAMPBELL made more than 2000 personal purchases on Company-1 credit cards and caused Company-1 bank accounts to pay for more than \$600,000 of her personal expenses.

**C. Execution of the Scheme to Defraud**

11. On or about June 6, 2018, at Kent, in the Western District of Washington, BRENDA S. CAMPBELL, for the purpose of executing the above-described scheme to defraud, did knowingly transmit and cause to be transmitted by means of wire communication in interstate commerce, writing, signals, and sounds, to wit: CAMPBELL used the BOA Company Card to make a \$3352.31 payment to Les Schwab Tires in Kent, Washington, in connection with a purchase for her personal vehicle, which caused an interstate wire transmission from the State of Washington to another state.

All in violation of Title 18, United States Code, Section 1343.

**FORFEITURE ALLEGATIONS**

The allegations contained in Count 1 of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

Upon conviction of an offense alleged in Count 1, the defendant, BRENDA S. CAMPBELL, shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to that offense. All such property is forfeitable pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), and includes but not limited to a sum of money



1 reflecting the proceeds the defendant obtained from the offense, as well as any property  
2 involved in the offense.

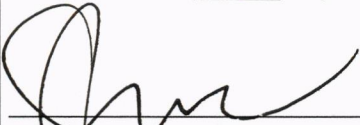
3 (Substitute Assets)

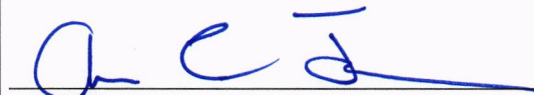
4 If any of the above-described forfeitable property, as a result of any act or  
5 omission of the defendant,


- 6 a. cannot be located upon the exercise of due diligence;  
7 b. has been transferred or sold to, or deposited with, a third party;  
8 c. has been placed beyond the jurisdiction of the Court;  
9 d. has been substantially diminished in value; or  
10 e. has been commingled with other property which cannot be divided without  
11 difficulty;

12 it is the intent of the United States, pursuant to Title 21, United States Code, Section  
13 853(p), and Title 28, United States Code, Section 2461(c), to seek the forfeiture of any  
14 other property of the defendant, up to the value of the above-described forfeitable  
15 property.

16  
17 DATED this 4<sup>th</sup> day of January, 2021.

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United States Attorney

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23 ANDREW C. FRIEDMAN  
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26 BRIAN D. WERNER  
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